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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

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AUG 20 1985

Mr. J. A. Rowe, Jr.
Vice President, Operations
CPS Chemical Co., Inc.
P.O. Box 162
Old Bridge, NJ 08857

RE: Notice of Deficiency - Preliminary Review of Part B Application for CPS Chemical Co., Oldbridge, NJ, EPA ID NO. NJD 002 141 190

Dear Mr. Rowe:

The Bureau of Hazardous Waste Engineering (the Bureau) has conducted a preliminary review of your company's Part B permit application submitted to this office on July 17, 1985, and has found it to be deficient. The following deficiencies need to be corrected before further processing of the referenced facility's application can occur.

Please find attached a checklist of items which must be submitted to comprise an administratively complete Part B. Any items marked "no" are items found deficient or absent, while items marked "yes" are found to be complete in the preliminary review. A comment sheet is also attached to explain these deficiencies. CPS Chemical Co., Inc. is hereby advised to submit documentation to correct the above mentioned deficiencies within thirty (30) days of the date of this letter.

The application contains certain documents labeled 'confidential'. Pursuant to N.J.A.C. 7:14-11.5(a)21(2), the referenced facility is hereby advised to provide substantiation for the claims of confidentiality. The referenced facility is required to submit these documents within ten (10) days of the date of this letter. Failure to provide the necessary information will result in the Department placing the unsubstantiated information in the public file.

Please be advised that although not currently specified in New Jersey hazardous waste regulations, the Department requires all future permits issued to incorporate a soil contaminant monitoring program as a permit condition. Therefore, the referenced facility is hereby advised to prepare a soil sampling and monitoring plan. As soil sampling regulations are still in the draft stage, the Department has not yet developed an official compliance guides issued any public notice on these rules. However, the Bureau requests the referenced facility to prepare a soil sampling plan that includes the attached information.

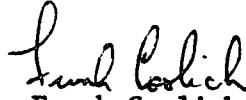


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The soil sampling and analysis plan using the guidelines attached shall be submitted to this office within sixty (60) days of the date of this letter.

Should you have any questions on any of the above requirements, please contact Shree Dharasker, of my staff at (609) 633-2975.

Very truly yours,



Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

EP48/slw

Enclosures

c: Angel Chang, USEPA

Comments

1. Pursuant to N.J.A.C. 7:26-9.6, preparedness and prevention, the referenced facility must modify their Part B to address the following:
 - a. The referenced facility should indicate how communications and alarm systems, fire protection equipment, spill control equipment and decontamination equipment will be tested and maintained to assure proper operation during an emergency.
 - b. The referenced facility should indicate how it shall maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment within the drum storage area during an emergency.
2. Pursuant to N.J.A.C. 7:26-9.7, the referenced facility should revise the existing contingency plan to address the following deficiencies:
 - a. The plan should describe arrangements with local police, fire department, local emergency teams, contractors and hospitals in order to co-ordinate emergency services. Such arrangements should include copies of any correspondence between the facility and local authorities.
 - i. Agreements with local police and fire departments on coordination of activities in case of emergency i.e. designation of a primary emergency authority and agreements with others to provide support to the primary emergency authority.
 - ii. Agreements with emergency response contractors and equipment supplies.
 - iii. Arrangements to familiarize local hospitals with the properties of the hazardous waste handled at the facility and the types of injuries or illnesses which could result from an emergency at the facility.
3. Pursuant to N.J.A.C. 7:26-9.4(e)liii, 'No smoking' signs shall be conspicuously placed wherever hazardous wastes are being handled and the location of these signs should be clearly indicated in the Part B.
4. Pursuant to N.J.A.C. 7:26-12.2(e)13, the following additional information should be provided:
 - a. Surrounding boundaries (residential, commercial, agricultural, recreational).

The referenced facility should provide a city zoning map or an explanation of the submitted tax map clearly identifying the use of the surrounding areas.

b. A wind rose

The information provided in the Part B should incorporate a wind graph of wind direction versus wind speed at the site. Such graphs are available at local airports. Please find attached copies of wind graphs for the Newark area.

- c. Legal boundaries of the hazardous waste management facility should be clearly shown on the submitted tax map or other drawing.
- d. Location of any injection and withdrawal wells should be clearly shown.
- e. Identification of zoning restrictions actual uses to which land is put and all public buildings within one mile of the facility should be indicated.

5. Pursuant to N.J.A.C. 7:26-12.2(e)20, the referenced facility must submit a copy of the existing liability insurance policy covering sudden accidental occurrences as outlined in N.J.A.C. 7:26-9.13.

Please find enclosed a list of insurance companies offering pollution liability insurance for future reference.

- 6. Pursuant to N.J.A.C. 7:26-12.2(e)22, the referenced facility should indicate traffic patterns, volume (number and type of vehicles) and control (access road surfaces and load bearing capacities).
- 7. Pursuant to N.J.A.C. 7:26-12.2(f)2(iii), the referenced facility should provide clear and legible designs of all the hazardous waste storage tanks. The drawings enclosed in the Part B are not legible enough to meet the requirements of this section.

In addition, a design of Tank 311 should be included. This design has been omitted in the submitted Part B.

- 8. Pursuant to N.J.A.C. 7:26-12.2(f)(v), the referenced facility should provide a brief description of any control features of the Hazardous Waste Storage Tanks such as safety out of valves, bypass systems, vents, and level indicators.

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Attachments

c: Angel Chang, USEPA

HAZARDOUS WASTE FACILITIES CHECKLIST

Applicant: CPS Chemical Corporation Inc., EPA ID NO. NJD 002 141 190

Application for: Part A. X Part B

Facility Type: TSDF

Part A

Yes No N/A*

- | | | | |
|----------|-------------|-------------|---|
| <u>X</u> | <u> </u> | <u> </u> | Activities conducted by the applicant. |
| <u>X</u> | <u> </u> | <u> </u> | Name, mailing address and location of the facility. |
| <u>X</u> | <u> </u> | <u> </u> | Name, address, and telephone number of the owner(s) of the facility. |
| <u>X</u> | <u> </u> | <u> </u> | Up to four Standard Industrial Classification (SIC) codes which best reflect the principal products or services provided by the facility. |
| <u>X</u> | <u> </u> | <u> </u> | Operator's name, address, telephone number, ownership status and status as a Federal, State, private, public or other entity. |
| <u>X</u> | <u> </u> | <u> </u> | Facility located on Indian lands. |
| <u>X</u> | <u> </u> | <u> </u> | Permits or construction approvals received or applied for according to N.J.A.C. 7:26-12.2(d)7. |
| <u>X</u> | <u> </u> | <u> </u> | Topographic map according to N.J.A.C. 7:26-12.2(d)8. |
| <u>X</u> | <u> </u> | <u> </u> | Brief description of the nature of the business. |
| <u>X</u> | <u> </u> | <u> </u> | Latitude and longitude of the facility. |
| <u>X</u> | <u> </u> | <u> </u> | Indication if the facility is new or existing and whether it is a first or revised application. |
| <u>X</u> | <u> </u> | <u> </u> | For existing facilities, a scale drawing of the facility according to N.J.A.C. 7:26-12.2(d)12. |
| <u>X</u> | <u> </u> | <u> </u> | For existing facilities, photograph of the facilities according to N.J.A.C. 7:26-12.2(d)13. |
| <u>X</u> | <u> </u> | <u> </u> | Types of hazardous waste listed or designated under N.J.A.C. 7:26-8.1 <u>et seq.</u> to be treated, stored or disposed annually. |
| <u>X</u> | <u> </u> | <u> </u> | Estimate of the quantity of wastes to be treated, stored or disposed annually. |
| <u>X</u> | <u> </u> | <u> </u> | General description of the process. |

*N/A - Not Applicable

Part B

Yes No N/A*

X — —

General description of the facility and how it will operate to accept, treat, store and dispose of hazardous waste.

X — —

Waste analysis plan.

X — —

Chemical and physical analysis of hazardous waste to be handled at the facility.

X — —

Flow schematics, material balance, and general type of equipment to be used.

X — —

Description of the security procedures and equipment required by N.J.A.C. 7:26-9.4(h).

X — —

Copy of the general inspection schedule required by N.J.A.C. 7:26-9.4(f) and 7:26-10.1 et seq.

Comment #1

— X —

Description of the preparedness and prevention procedures and equipment required by N.J.A.C. 7:26-9.6.

Comment #2

— X —

Contingency plan and emergency procedures required by N.J.A.C. 7:26-9.7.

X — —

Engineering designs according to N.J.A.C. 7:26-12.2(e)

X — —

Description of procedures, structures or equipment used at the facility according to N.J.A.C. 7:26-12.2(e)10.

Comment #3

— X —

Description of precautions to prevent ignition or reaction of ignitable, reactive, or incompatible waste as required by N.J.A.C. 7:26-9.4(e).

X — —

Deed, lease, options, etc.

Comment #4

— X —

Topographic map according to N.J.A.C. 7:26-12.2(e)13.

— — X

Seismic activity information as per N.J.A.C. 7:26-12(e)

X — —

Identification of whether the facility is located within 100 year flood plain according to N.J.A.C. 7:26-12.2(e)

X — —

Closure plan.

— — X

Post-closure plan.

— — X

For existing facilities, documentation that a notice has been placed in the deed or appropriate alternative instrument as required by N.J.A.C. 7:26-9.9(m).

X — —

The most recent closure cost estimate for the facility prepared in accordance with N.J.A.C. 7:26-9.10(d), plus a copy of the financial assurance mechanism adopted in compliance with N.J.A.C. 7:26-9.10(e).

	Yes	No	N/A*	
Comment #5	<u> </u>	<u> X </u>	<u> </u>	Copy of the insurance policy according to N.J.A.C. 7:26-12.2(e)20.
	<u> X </u>	<u> </u>	<u> </u>	Disclosure Statement.
	<u> </u>	<u> </u>	<u> X </u>	Environmental and Health Impact Statement (EHIS).
	<u> X </u>	<u> </u>	<u> </u>	CP #1 form and supplement.
	<u> X </u>	<u> </u>	<u> </u>	Application fee.
	<u> X </u>	<u> </u>	<u> </u>	Engineering fee.
	<u> X </u>	<u> </u>	<u> </u>	Plans, drawings and narrative reports signed and sealed by N.J.P.E.

CERTIFICATION

Yes No

<u> X </u>	<u> </u>	Certificate of liability from the signing applicant according to N.J.A.C. 7:26-12.2(j).
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Additional information required for:

Facilities that store containers of hazardous waste

Yes No N/A*

<u> X </u>	<u> </u>	<u> </u>	Description of the containment system according to N.J.A.C. 7:26-12.2(f)1i.
<u> X </u>	<u> </u>	<u> 1 </u>	Sketches, drawings or data demonstrating compliance with N.J.A.C. 7:26-9.4(d).

Facilities that use tanks to store or treat hazardous waste

Yes No N/A*

<u> X </u>	<u> </u>	<u> </u>	Design standards or other available information of the tank.
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Comment #7	<u> </u>	<u> X </u>	<u> </u>	Tank dimensions, capacity and shell thickness.
	<u> X </u>	<u> </u>	<u> </u>	Diagram of piping, instrumentation and process flow.
Comment #8	<u> </u>	<u> X </u>	<u> </u>	Description of feed system, safety cutoff, by-pass systems and pressure controls.
	<u> </u>	<u> </u>	<u> X </u>	Description of procedures for handling incompatible ignitable, or reactive waste, including the use of buffer zone.

Facilities that store or treat hazardous waste in surface impoundments

Yes	No	N/A*	
—	—	<u>X</u>	Statement indicating minimum freeboard according to N.J.A.C. 7:26-10.6. For flow through facilities a hydraulic profile shall be included.
—	—	<u>X</u>	Detailed drawings of the structure which will be provided to stop the flow into the impoundment.
—	—	<u>X</u>	Detailed drawings of any dikes.
—	—	<u>X</u>	Detailed designs, drawings and specifications of the liner(s) and the leachate detection, collection and removal system.
—	—	<u>X</u>	Liner installation instructions. For existing facilities a description of the installation procedures used.
—	—	<u>X</u>	Description of the maintenance and repair procedures proposed to comply with N.J.A.C. 7:26-10.6(c)4 and 7:26-9.4(f).
—	—	<u>X</u>	Description of the operating procedures according to 7:26-10.6(j), (k) and (l).
—	—	<u>X</u>	Site geology according to N.J.A.C. 7:26-12.2(f)3xii.

Facilities that incinerate hazardous waste

Yes	No	N/A*	
—	—	<u>X</u>	Submission of all requirements of a Trial Burn Plan according to N.J.A.C. 7:26-12.9(b).
—	—	<u>X</u>	Submission of results of trial burn according to N.J.A.C. 7:26-12.2(f)4i.
—	—	<u>X</u>	Submission of results of comparable incinerator data according to N.J.A.C. 7:26-12.2(f)4ii and iii.